TRULINCS 03260180 - ELLIS, PRISCILLA ANN - Unit: WAS-D-A

FROM: 03260180

TO:

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SUBJECT: Injunction Motion #1 DATE: 04/04/2025 02:45:36 PM

IN THE UNITED STATES DISTRICT COURT FOR THE\

MINNESOTA DISTRICT

Priscilla A. Ellis Inmate Reg # 03260-180 Plaintiff

INJUNCTION /TRO CIVIL NO: FILED

United States District Court

Oublin Inmake Sent to WASECA

CASE # 4:23-00-04155-

Federal Bureau of Prisons Employee

Unit Manager C. Parrent

Waseca Federal Correctional Institute employee

CLERK, U.S. DISTRICT COURT OAKLAND OFFICE

Plaintiff Hereby request this HONORABLE Court to issue an immediate Preliminary Injunction/ TRO to STOP prevent Unit Manager C. Parrent from entering Waseca Federal Correctional Institute premises while Inmate Priscilla Ellis with Reg #03260-180 is housed there under ANY CAPACITY, whether General Population or otherwise which will prevent him from causing further Physical injuries from Physical harm, sexual harassment and other physical abuse which left bruises on Plaintiff (see attached Witness statements).

Plaintiff meet all 4 criteria's pertaining to a preliminary injunction / TRO pursuant to Rule 65 of Federal Rules of Civil procedure.

- 1. Evidence will proceed proceed @ trial to support the fact that defendant C. Parrent violated Plaintiff's rights and safety and her well being of being free from physical abuse, verbal abuse, sexual abuse and to be safe and secure in the Walls of Waseca Federal Correctional institute from Staff /inmate abuse
- 2. Plaintiff is likely to suffer more irreparable harm if preliminary injunction is not received.

Defendant C. Parrent has already caused Grave physical injuries by physical;ly assaulting/ attacking plaintiff in his office on 3/3/2025, evident witness statements attached who witnessed bruises.

3. Plaintiff faces a Greater Harm from Prison Unit Manager C. Parrent, as he FREELY walks the compound while investigation plays out, and can come into contact with Inmate Ellis to cause more physical injuries /sexual assault at his will without any restraints, anytime, anywhere at anytime on Waseca Federal Correctional Institution grounds where inmate Ellis is housed, meaning that Mr C. Parrent can cause further Harm constituting to more physical injuries and mental and emotional abuse as well.

PLAINTIFF saw C. Parrent on 3 April 2025 in Center Hall (evidence camera footage around 11:30 am and he was smirking at Plaintiff as he was talking to another inmate and this made Plaintiff feel violated again, unsafe and mentally and emotionally under attach with no control of her surroundings.

4. Preliminary Injunctions will serve the Public's interest, as the Plaintiff's accountability is to the Public as well as the Public is interested in all AIC's in custody being SAFE from STAFF AND INMATE abuse in reference to ALL HARM and abuse to include sexual and physical assaults such as what C. Parrent indulged himself against plaintiff.

A Preliminary injunction is appropriate as the Harm that plaintiff faced from the defendant Mr C. Parrent is ongoing and engaged as long as he wanders freely around on the Waseca FCI compound while investigation continues as well as the results of Plaintiff seeking criminal charges against C. Parrent.

The Supreme Court, in Lewis v Casey 518 U.S. 343 (1996) stated that a Prisoner must only show "actual imminent injury" (see attached statements) (2) with more to come from witnesses that acknowledged the injuries immediately after the event or within the following days of the physical assault.

Plaintiff received PHYSICAL INJURIES, although to request an injunction, plaintiff only need to show that she /he will be worse

TRULINCS 03260180 - ELLIS, PRISCILLA ANN - Unit: WAS-D-A

off due to the illegal acts of the prison staff/inmate or person carrying out the physical, mental or sexual abuse.

Plaintiff is already in Prison as an Actual innocent victim as a Honorable Army Veteran being used as a scapegoat for the crime of others, and should not have to consistently be subjected to sexual Harassment, physical assaults, physical abuse which causes physical injuries as well as mental and emotional injuries AND scars.

Granting the injunction is necessary to correct / STOP ongoing violation of plaintiff;s rights to be SAFE in custody from PHYSICAL , SEXUAL and VERBAL ABUSE from Staff as well as inmates.

Unit Manager C. Parrent should not be walking around on compound as to say that he is ABOVE the law, and is still working which continue to put inmate in imminent harm from his physical, sexual verbal assaults' and abuse.

Plaintiff is requesting this HONORABLE Court /Clerk to issue and GRANT a TRO until the Injunction can be heard. Plaintiff does meet ALL requirements for a TRO pursuant to Rule 65 of the Federal Rules of Civil Procedures.

Plaintiff qualifies under the Violence Against Women Act, 18 U.S.C. 2246 and wishes to File criminal charges for the PHYSICAL Assault by Unit Manager C. Parrent. The Bruises were so extensive and embedded, until they were visible on Plaintiff's Flesh for well over 3 weeks prior to totally fading away. Neither Lieutenant Tarrant nor Nurse Peterson would take a picture o the bruise, both claiming the other would take the pictures. Neither did SIA Rice, as the bruise was also displayed to him as well as Psychologist Turner in conjunction to other inmates that witnessed it immediately AFTER the physical contact with Mr C. Parrent.

This is called Staff trying to cover for staff's corruption. Another staff member Ms. Lloyd told inmate Jodeci Holmes (Inmate Reg # 59778-510 that she was accused of shaking an inmate, but because it was NOT on camera, it was dropped.

"Is this how they get away with things? If an inmate is accused of an infraction, not on camera, it's not dropped, why should a staff member receive extra treatment? Right is right and wrong is wrong, no matter what Country/World that you exist.

An inmate should not be subjected to accept abuse form a staff member, just because they are an employee, it is a CRIME to physically assault in or out of prison, Sexually, physically and in some cases verbally when it comes to harassment.

Mr Parrent's conduct of Physical assault while in an employee position is also Abuse of Color of State Law.

ALL Co-workers stick together as Ms Lloyd stated to Inmate Holmes Reg # 59778-510. Inmate Sadie Hackett can attest to Mr Parrent's abuse, Inmate Destiny Duran, Inmate Cassandra Charity and others. There are plenty of witnesses and witness statements to corroborate plaintiff's claims and request for the TRO/Injunction.

Relief Requested:

Plaintiff is requesting hat the Court/Clerk issue an INJUNCTION or TRO to STOP Unit Manager Parrent from stepping foot on the Institution of Waseca FCI while Plaintiff is housed there on this compound and to demand that Unit Manager C. Parrent CEASE Harassment and physical violence and verbal assaults' and innuendos towards plaintiff immediately.

Plaintiff is also requesting the court to direct the AUSA in this jurisdiction to proceed with criminal charges against Unit Manager C. Parrent for Physical Assault against plaintiff because she would not agree to his comments to "Suck his Dick"!

The Waseca FCI failed to keep Plaintiff safe from physical injury and therefore is seeking declatory relief from the court in form of TRO/Injuryction.

Respectfully Submitted;

Priscilla A. Ellis

Pro-Se'

U.S. Army Veteran

D Unit Waseca FCI P.O. Box 1731

TRULINCS 03260180 - ELLIS, PRISCILLA ANN - Unit: WAS-D-A

Waseca, MN 56093

Attachments: Written claim of PREA to OIA, Witness statements Confirming the Bruises from Assault.

CERTIFICATE of SERVICE:

Mailed on 4/4-2025 from Waseca FCI Mail room via certified delivery

Priscilla A. Ellis U.S. Army Veteran

Pro-se'

Case 4:23-cv-04155-YGR Document 480 Filed 04/22/25 Page 4 of 15 TRULINCS 03260180 - ELLIS, PRISCILLA ANN - Unit: WAS-D-A FROM: 03260180 SUBJECT: INJUNCTION DATE: 04/04/2025 12:00:35 PM IN THE UNITED STATES DISTRICT COURT FOR THE MINNESOTA DISTRICT Priscilla A. Ellis Plaintiff CIVIL ACTION No: VS. Federal Bureau of Prisons Employee Unit Manager Parrent, Waseca FCI Upon the complaint, the supporting affidavits of the Plaintiff, and the memorandum of law submitted herewith, it is; ORDERED that defendants Unit Manager C. Parrent show cause in room _____ of the United States Courthouse, o clock, why a preliminary injunction should not issue pursuant to Rule 65 (a) of the Federal on the day of Rules of Civil Procedure enjoining the defendants, their successors in office, agents and employees and all other persons acting in concert and participation with them, from stepping foot on Waseca Federal Correction Institution and or physical contact with Inmate Priscilla Ellis in a manner to cause her further Physical injuries. Mental anxiety and or emotional harm/injuries. IT IS FURTHER ORDERED that effective immediately and pending the hearing and determination of this order to show cause, the defendants Unit Manager C. Parrent and each of their Officers, agents, employers, and all persons acting in concert or General population or other means of housing/ Otherwise.

participation with them, are restrained from physical contact with Inmate Priscilla Ellis, United States Honorable Army Veteran in a manner to cause her further physical injuries, Mental anxiety and or emotional harm/injuries and must stop from entering the compound / Federal Institution Waseca Federal Correctional Institute while Inmate Priscilla Ellis is housed there in any Capacity

IT IS FURTHER ORDERED that the order to show cause, and all other papers attached to this application, be served on the aforesaid plaintiffs/defendants immediately.

Judge	
Dated:	

UNITED States District Judge

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TRULINCS 03260180 - ELLIS, PRISCILLA ANN - Unit: WAS-D-A

FROM: 03260180

TO:

SUBJECT: Witness Statement DATE: 04/03/2025 10:23:49 AM

WITNESS STATEMENT

1 Ang e/11 2 low log witnessed the fresh Bruise on the arm of Mrs. Priscilla Ellis, on 3-3 through 3-14 2025. The Bruise was there after Mrs. Ellis was assaulted physically by Mr. Parrent, Unit Manager, throwing her out of his office.

Ms Ellis went to have a PREA evaluation done by Nurse Peterson whom told Ms. Ellis that the Lieutenant's Office would take a picture of the Bruise, but the Lieutenant's office did not.

I am a witness that the Bruise was there and the only other person that Ms. Ellis came into contact with prior to the Bruise being there is Unit Manager Parrent in his office.

I attest to the penalties of perjury that the above statements are true.

/5564-0/0 Print Name and Reg #

Signature To welly

I offered A picture ticket to Ms Eths For Nec to take A picture of the Bruisp Since the Lt 1 medical refused to. Titis XS Abuse of Power and Colluded Cornystion to wer up their Abuse & wrong doings.

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TRULINCS 03260180 - ELLIS, PRISCILLA ANN - Unit: WAS-D-A

FROM: 03260180

SUBJECT: Witness Statement DATE: 04/03/2025 11:45:04 AM

WITNESS STATEMENT

witnessed the fresh Bruise on the arm of Mrs. Priscilla Ellis, on 3-3 through 3-14 2025. The Bruise was there after Mrs. Ellis was assaulted physically by Mr. Parrent, Unit Manager, throwing her out of his office.

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I am a witness that the Bruise was there and the only other person that Ms. Ellis came into contact with prior to the Bruise being there is Unit Manager Parrent in his office.

I attest to the penalties of perjury that the above statements are true.



FOR OFFICE USE ONLY.

DATE RECEIVED:
CASE NUMBER:

COMPLAINT

ALLEGING FAILURE OF DEPARTMENT OF JUSTICE EMPLOYEE TO PROVIDE RIGHTS TO A CRIME VICTIM UNDER THE CRIME VICTIMS' RIGHTS ACT OF 2004

Return signed form, including additional pages or documents, to:

Chief, Office of Internal Affairs Federal Bureau of Prisons 320 First St., NW, Room 600 Washington, DC 20534

This Complaint form is not designed for the correction of specific victims' rights violations, but is instead to request corrective or disciplinary action against Department of Justice employees who may have failed to provide or have violated the rights of a crime victim under the Crime Victims' Rights Act of 2004. A crime victim includes any person who has been directly and proximately harmed as a result of the commission of a Federal offense or an offense in the District of Columbia.

All complaints must be submitted within sixty (60) days of the victim's knowledge of a violation by the Department of Justice employee, but not more than one year after the actual violation. Receipt of complaints will be acknowledged in writing.

The information provided herein will be used along with other information developed during the investigation to resolve or otherwise determine the merits of this complaint. The information may be furnished to designated officers and employees of agencies and departments of the Federal Government in order to resolve or otherwise determine the merits of this complaint.

Please check the box that applies to the person filing this complaint.

Victim Attorney representing victim Legal Guardian Other representative (describe)	
Name, phone number and relationship to victim of person completing this form (if not the victim). HISCITA A EILS - (I m Lhe VICH)	
P.O.C 2-54-635-6285 SISEN: Stand Circles in this complaint? EYER INO	
If yes, please provide the attorney's name and contact information. All future contacts with the victim regarding this complaint will be made through the attorney.	
AHorney Deb Colden, Altorney Bex Collins	-
Altorney Amaris @ Rights Behind Bas	

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3. <u>INFORMATION ABOUT TH</u>	HE VICTIM'S COMPLAI	NT		
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The right to be reasonably protected from the accused.

The right to reasonable, accurate, and timely notice of any public court proceeding, or any parole proceeding, involving the crime or of any release or escape of the accused.

The right not to be excluded from any such public court proceeding, unless the court, afer receiving clear and convincing evidence, determines that testimony by the victim would be materially altered if the victim heard other testimony at that proceeding.

The right to be reasonably heard at any public proceeding in the district court involving release, plea, sentencing, or any parole proceeding.

The reasonable right to confer with the attorney for the Government in the case.

The right to full and timely restitution as provided by law.

The right to proceedings free from unreasonable delay.

The right to be treated with fairness and with respect for the victim's dignity and privacy.

STATEMENT OF COMPLAINANT

Please provide as much detailed information about your complaint against the Department of Justice employee(s) as possible, including the date(s) of the alleged violation(s), and an explanation of how the violation(s) occurred. However, you should documents to this complaint

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ADMINISTRATIVE REMEDY RESPONSE Log No: 1228729-F2

I, Ellis, Priscilla, 03260-180 agree to informally resolve my Administrative Remedy number 1228729-F2

Ellis, Priscilla, 03260-180

A. Tarrant, Lieutenant

J J J T

Date

2127125

Date

Proof of Mr. Privents Retaliation,

A day or two After I with about this

complaint, Mr. Privent moved me housing

units & Physically Assaulted me.

WAS-1330.18d Attachment A

INFORMAL RESOLUTION ATTEMPT

In accordance with Program Statement 1330.18b, <u>Administrative Remedy Program</u>, this form will serve as documentation by the respective staff member and the Unit Manager to indicate an informal attempt to resolve the complaint of the following inmate.

A BP-9 WILL NOT BE ACCEPTED WITHOUT THIS COMPLETED FORM ATTACHED. NAME: TISCILLE A SILLS REGISTER NO: 03260-180 DATE ISSUED: 3-4-25 1. Nature of complaint (to be completed by inmate): FIRST SIED ACT OF 2018 2150 CONTRS DOSING AS WELL AS CUSTIMINATE FAIL FAILER WITH 12010 Clear Product AS CUSTIMINATE FAIL FAILER WITH 12010 Clear Product AS CUSTIMINATE FAIL FAILER WITH 12010 Clear Product AS CUSTIMINATE FAIL FAILER FOR THE SIED AS MICHAELE AS CUSTIMINATE FAIL FAILER FOR THE SIED AS MICHAELE AS CUSTIMINATE FAIL FAILER FOR THE SIED AS CONTROLLED AS CUSTIMINATE FAIL FAILER FOR THE SIED AS CONTROLLED AS CUSTIMINATE FAILER FOR THE SIED AS CONTROLLED AS CUSTIMINATE FAIL FAILER FOR THE SIED AS CONTROLLED AS CUSTIMINATE FAIL FAILER FOR THE SIED AS CONTROLLED AS CUSTIMINATE FAIL FAILER FOR THE SIED AS CONTROLLED AS CUSTIMINATE FAIL FOR THE SIED AS CONTROLLED AS CUSTIMINATE FOR THE SIED AS CONTROLLED AS CUSTI
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